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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARYBefore the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of

Implementation of Section 17
of the Cable Television
Consumer Protection and
Competition Act of 1992Compatibility Between
Cable Systems and Consumer
Electronics Equipment

ET Docket No. 93-7

NOTICE OF INQUIRY

Reply Comments of Scientific-Atlanta

Scientific-Atlanta is a world leader in broadband communications systems, satellite-based communications networks and instrumentation for industrial, telecommunications and government applications.

The company is a recognized worldwide leader in the development and manufacture of cable television equipment used in more than 100 countries and 9,000 local cable sites in the United States, in both analog and digital formats. Scientific-Atlanta is a leading supplier of subscriber systems to cable operators, with over six million addressable and eight million non-addressable cable converters installed throughout the U.S. The company is participating in the EIA-NCTA Committee which is attempting to address the issues in this notice.

These reply comments to the FCC Notice of Inquiry on equipment compatibility are aimed at the comments submitted by several entities on the subject of the EIA 563 multiport interface standard.

It has been asserted by some filers that the EIA 563 multiport concept is not compatible with future trends in cable technology, particularly digital compression technology. It is our assertion that the EIA 563 multiport standard is compatible with the future trends in cable technology, and can easily be adapted for use with both HDTV and digital compressed video signals.

Attached are two documents supporting that assertion application of the multiport of the future. Use of the EIA 563 multiport connector with digital compression.

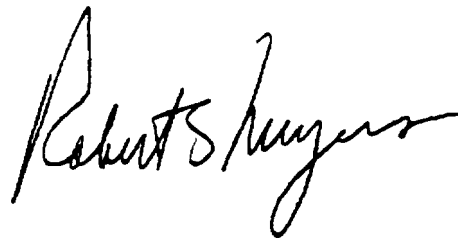
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Scientific-Atlanta continues to take the position that no one solution will address cable - consumer electronics compatibility issues.

Scientific-Atlanta has recommended several solutions for the existing base, including advanced addressable home terminals, dual tune/descramble terminals, and enhanced remote controls, and interdiction technology. The EIA 563 multiport interface device will not solve all of these problems, particularly in existing TV's and VCR's.

However, we believe that the EIA multiport interface can be compatible with future technologies, and we ask the commission to reject arguments to the contrary, in light of our detailed analysis presented here.

A handwritten signature in black ink, appearing to read "Robert S. Meyers". The signature is fluid and cursive, with a large initial "R" and "M".

USE OF THE EIA563 MULTIPORT CONNECTOR WITH DIGITAL COMPRESSION

Scientific-Atlanta, Inc.

The EIA Multiport was developed several years before the industry was thinking of digital compression to transmit programming to subscribers, but it is suitable for this use with one addition.

An IF output from the TV is needed. The reason is that transmission of compressed video will likely use a multi-level digital modulation system, and this is not compatible with a conventional AM vestigial sideband system as is used for conventional NTSC analog TV transmission.

Figure 1 shows the idea behind the use of Multiport with compression. The cable still is routed into the TV first. The TV provides an IF output developed at the output of the tuner. This goes to the digital compression decoder. In addition,

USE OF MULTIPORT WITH DIGITAL COMPRESSION



some advantages of HDTV, as we shall show below. The consumer will still have incentive to buy an HDTV set, because this is the only way he will be able to get a wide screen picture.

In order to allow use of a Multiport adapter with HDTV, it will be necessary to include 'Pan and Scan' information in the HDTV signal. This is used by the adapter to show the most important part of the wide screen picture on conventional NTSC narrow screens.

1. DIGITAL DECODER INTERFACE

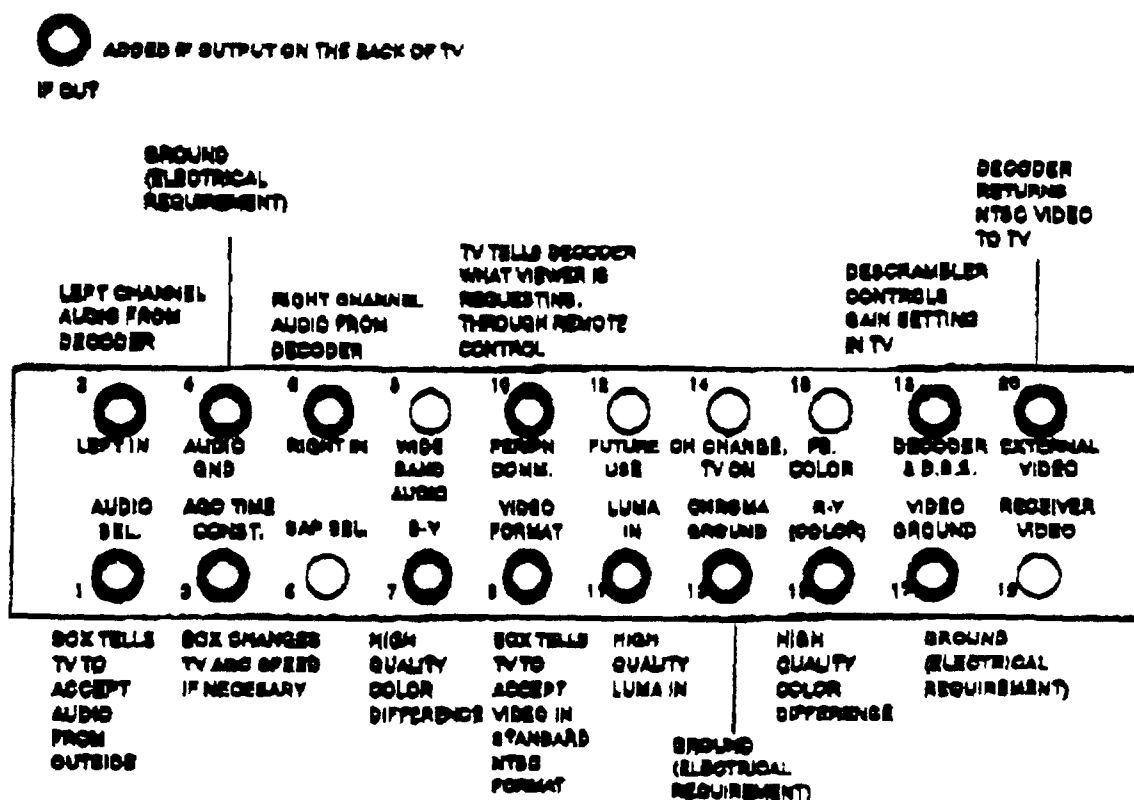


Figure 2

Figure 2 shows how the Multiport adapter would be used for decoding either HDTV or compressed TV signals. The added IF output is shown at the top left of the diagram. It is routed to the decoder as shown in figure 1. The Multiport connector is shown, with the pins used being shown heavier than the other pins.

Pin 1 tells the TV to accept audio from the decoder.

Pin 2 is the left audio from the decoder, which derives audio from the digital data stream.

Pin 3 controls the AGC speed in the TV. This may be necessary in some cases to facilitate recovery of the digital signal.

Pin 4 is the audio ground, and is required for high quality audio performance.

Pin 6 is the right audio in from the decoder.

Pins 7, 11 and 13 provide for the highest quality input from the decoder. In order to provide color in the same bandwidth as black and white, the NTSC system had to compromise on sharpness. We can overcome this with HDTV, but if we have to put the signal back into NTSC to deliver to the TV, we lose the advantage. These pins allow us to send signal to the TV in luminance and color difference format, which allows much better quality. As an alternative, the standard provides for S-VHS Y-C interface. This is intermediate in quality between NTSC and color difference transmission. For compressed signals, we are not likely to be able to take advantage of quality over that provided by the Y-C interface. For HDTV, however, we could use the extra quality. For the Y-C interface, pin 7 would not be needed.

Pin 10 is for peripheral communications, and will be used to tell the decoder how to operate. While the decompression function per se may not need instructions from the TV, it is certain that the decoder will also perform program denial functions, such as accepting an order for an impulse pay-per-view program. For these functions, it will be necessary to allow the subscriber to control the decoder through pin 10.

Pin 18 is needed because the AGC circuits in an NTSC TV aren't suitable for controlling gain of the digital signal. The decoder bears the burden of controlling the set point of the AGC, and does so by providing on pin 18, an NTSC-like sync signal which varies in amplitude in the manner the AGC detector expects from an NTSC signal.

Pin 20 is the input from the decoder which would be used if interface using NTSC is to be used. While not desirable from a quality point, it may be that provision should be made for NTSC video return to allow a manufacturer to provide a lower cost TV if he feels he can do so by accepting only an NTSC signal. Alternatively, a decoder manufacturer may find that he can build a more economical decoder if he only returns video in NTSC format.

The other pins are grounds. Multiple grounds are needed to allow high quality signal transmission.

In order to use the tuner in the TV for digital transmission, it must meet some specifications that are beyond those required for NTSC. Our tests indicate that they

required specifications are well within the state of the art in tuner design. Very likely, it will be appropriate to use a double conversion tuner, but this is being done in some cases for NTSC transmission now, because it has advantages over a single conversion tuner.

The specifications which a tuner will want to meet are currently estimated to be the following.

Frequency response: Flat to 1 dB peak to peak across 5 MHz.

Delay response: Flat to 20 nS peak to peak across 5 MHz.

Local Oscillator phase noise in 1 Hz bandwidth:

100 Hz displacement: -20 dB

1 KHz displacement: -55 dB

10 KHz displacement: -85 dB

100 KHz displacement: -105 dB

APPLICATION OF THE MULTIPORT CONNECTOR IN THE FUTURE

National Cable Television Association

With modern TV sets, it is not always necessary to use a cable box, except that premium programs are usually scrambled in order to deny access to non paying subscribers. The cable box is still necessary in order to descramble premium signals. Unfortunately, the use of the box gets in the way of a lot of things that the subscriber would like to do. The problems of using a box are well known to many cable subscribers, but the alternatives have a lot of problems. The 1992 cable law will likely make scrambling more important in the future.

The Multiport connector was originally conceived as a more satisfactory way to connect a TV and a cable box, making premium TV viewing easier for the subscriber. At the time, the developers recognized that Multiport could solve problems even beyond descrambling. Additional provisions were made to accommodate these functions, even though they were not well defined at the time. As a tribute to the original developers, as we have prepared this contemporary summary, we have considered applications that had not been proposed in the mid 80s, when the standard was developed. The contemporary applications fit nicely within the standard developed at that time. Were we to start again to define a connector with the same functionality, it is unlikely that we would come out with a substantially different definition than we have now, though a few extensions would be made.

In this document, we show some of the applications for multiport, illustrating the various ways to use the pins we have. All of the present pins are useful, though we have one pin, for SAP, that could probably be defined slightly differently now. In the appendix we shall discuss the impact on eliminating various functions.

Figure 1 shows three uses for the Multiport connector. The top application was the prototype application for which Multiport was developed. This application replaces the cable box with a simpler "set back" box, which literally can be placed in back of the TV set, out of the consumer's way. On channels which don't need to be descrambled, the box does nothing. On channels which are scrambled, but for which the consumer has not paid, the box can eliminate any picture or sound on the screen. This is a real service to the subscriber who might be offended by material on some channels. On scrambled channels to which the consumer has subscribed, the box begins descrambling, with the consumer not knowing that it happened.

Pay-per-view events can be ordered if the box is suitably equipped, using the TV remote control to order.

The consumer gets back all of the features of his TV set, including unobtrusive use of his remote control, picture in picture, etc. With suitable connection, he can watch one thing

and record another without having to worry about what is and is not scrambled,¹ and without having complex RF switching schemes, which are confusing and which often cause problems of their own.

A second application for Multiport is shown in the center of figure 1. Super VHS (S-VHS) tape recorders are available today, which offer better picture quality than do conventional VCRs. They must be connected to the TV differently than are conventional VCRs, in order to take advantage of much of the improvement. The S-VHS standard was introduced late in the development of the Multiport, but the standard can accommodate S-VHS.

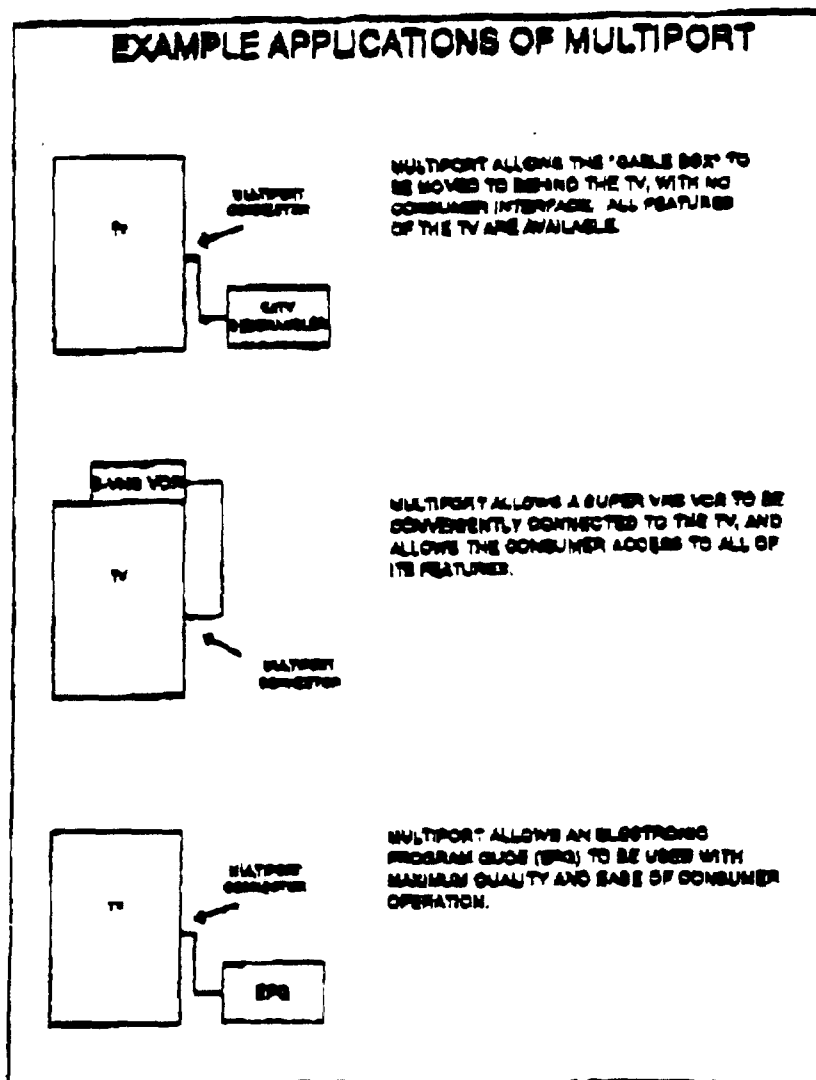


Figure 1

A third application of Multiport was not even conceived until after the standard was adopted. This is shown in the bottom of figure 1. Electronic Program Guides (EPGs) are being developed now to ease the confusion of subscribers, as the choice of programs has increased. In today's world, the subscriber may have up to nearly 80 program choices. In this environment, selecting the program by consulting a printed program guide, finding the channel number

¹A second box will be needed if both the channel being viewed and the channel being recorded are scrambled. This will not pose the same problems it does today; when the Multiport box reaches current set top volume production, it will be less expensive, making it easier for the consumer to have two boxes. Since the box doesn't include a remote control, the confusion of multiple remotes is reduced.

(not always an easy task itself today) and tuning the TV, takes so long that a great deal of the program can be shown while the poor consumer is trying to find the program he wants.

To ease this, EPGs are being proposed. A subscriber will use an EPG by activating it with his remote control. When he does, a program guide will appear on his screen. Using his remote control, the subscriber peruses the EPG, looking for something he likes.

Figure 2 shows the application of Multiport to the cable box. The highlighted connections are used. We assume that the signal being received is scrambled, with stereo audio hidden in the audio portion of the signal. The subscriber controls tuning with his remote control, including possible access to impulse pay-per-view programs, which he can order from his remote control. The TV receives the scrambled video and audio, and sends them to the CATV descrambler shown at the top of figure 1. Each of the pins in the connector is used as shown, to effect this process. Scrambled video is sent to the descrambling box on pin 19, and scrambled audio is sent on pin 8. The descrambling box returns descrambled video on pin 20, and descrambled stereo audio on pins 2 and 5. The box sets the TV to switch to the correct sources, using pins 1 and 9. The TV tells the box what to do, using pins 10 and 14. The other pins are needed for technical reasons, to make the system work.

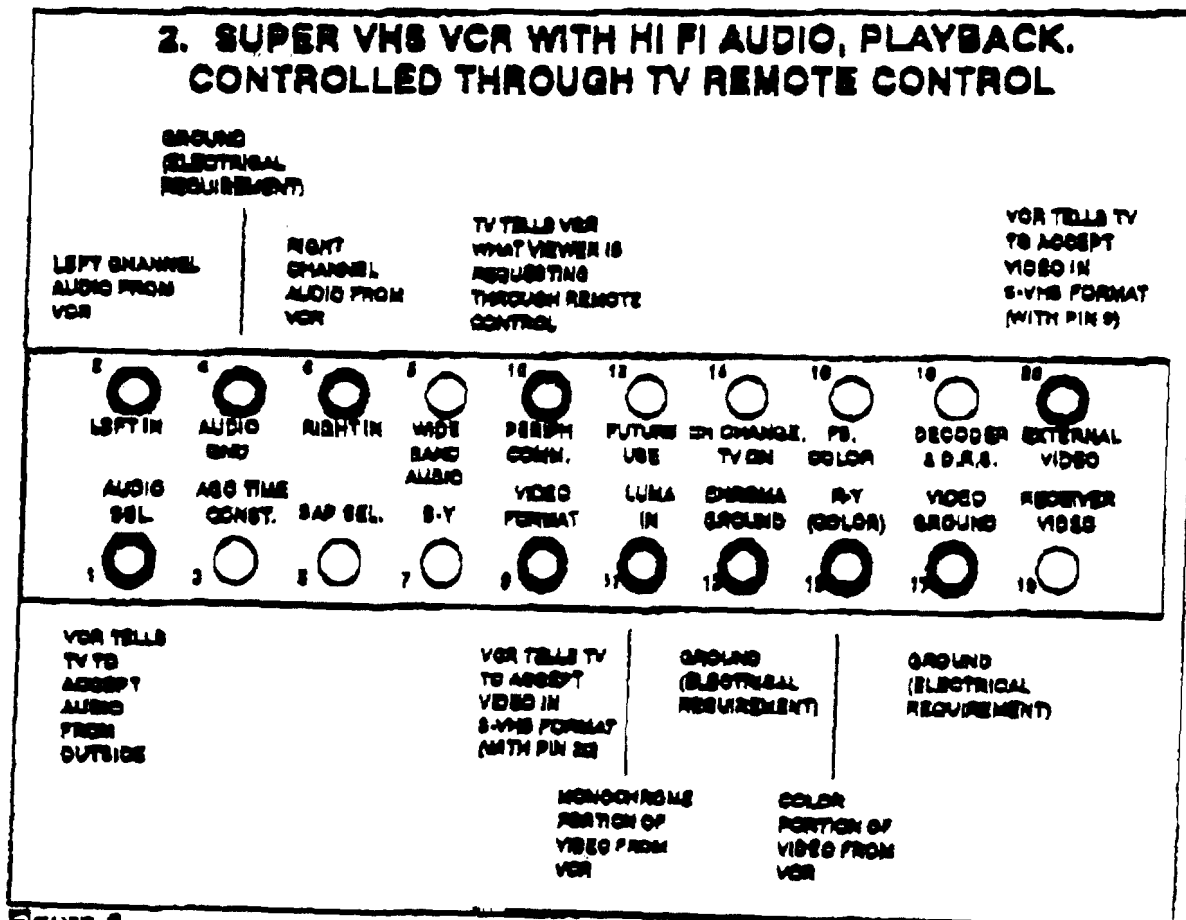


Figure 3

Figure 3 shows the pins used in the S-VHS example. Here we assume that the consumer controls the VCR through his TV remote control, through pin 10. The VCR

supplies video on pins 11 and 15.³ Audio is supplied on pins 2 and 4. Pins 1, 9 and 20 tell the TV where to find the video and what type of video it is. The other active pins are grounds, needed for optimum quality signals.

**3. ELECTRONIC PROGRAM GUIDE DISPLAYS CHOICES ON
TV SCREEN AND ALLOWS USER TO SELECT CHOICES USING
TV REMOTE CONTROL**

**SPS TELLS TV HOW
TO TUNE TO MEMOR
VIEWS'S REQUEST**

controlled through the TV remote control, and this data is passed on pin 10. The future use pin. 12, will probably be required to allow the EPG circuitry to control the TV's tuning, allowing the consumer to highlight the program, and have it automatically tuned without the consumer knowing the channel number. The other active pins are used for technical reasons.

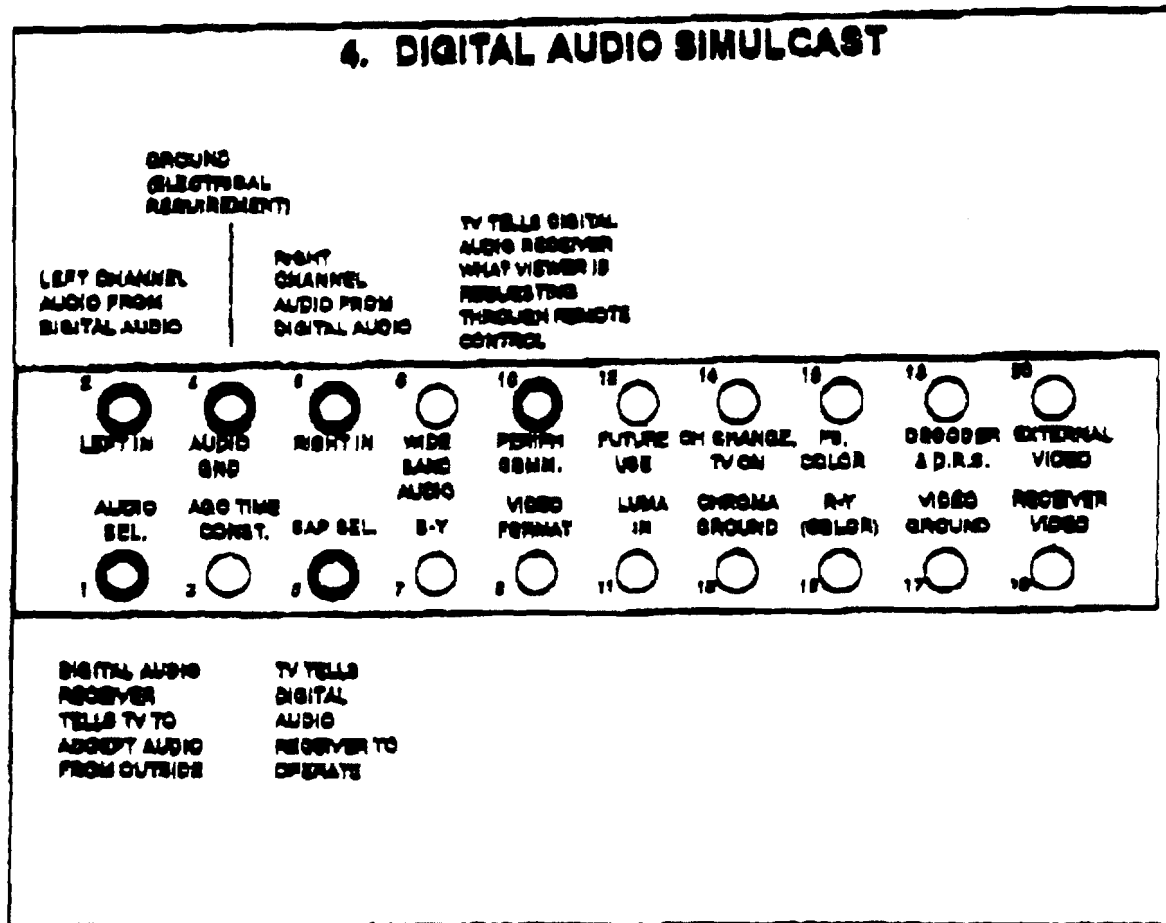


Figure 5

Yet another application is shown in figure 5. Here we are using a digital audio simulcast, in which a viewer is watching, for example, a concert in which audio quality is important. The audio is being sent on a digital audio channel in addition to being sent with the TV signal. In order to view the picture and simultaneously hear the high quality digital audio, the viewer has attached a digital audio receiver to his Multiport plug on the TV set. Pin 5 is used to allow the TV to instruct the digital audio receiver to work.* Pin 10 tells the

*While not a true application for SAP, the pin can be used for other things such as this, which were not envisioned at the time the Multiport standard was adopted.

digital audio receiver what channel is tuned, and the receiver knows how to tune the corresponding digital audio. The audio is returned to the TV on pins 2 and 8. In this case, the receiver tells the TV to use audio from the outside, but to use its own video.

APPLICATION OF MULTIPOINT TO DIGITAL TRANSMISSION

One of the newest proposals for TV transmission is digital compression. A problem with compression is the enormous investment the public has made in conventional analog TV sets. This investment must be preserved in a transition to compression. Due to the investment in conventional TV, and the embryonic stage of digital TV development, we are likely many years from a complete switch-over to digital transmission. In order to begin reaping the benefits of digital transmission earlier, use of a converter is necessary. One way to do so is to use a set top converter to convert the selected compressed signal to a conventional NTSC analog signal, then supply it to the TV. To do so in today's world would require a decompression set top box, which would doom the subscriber to having a set top converter on his TV until digital transmission becomes the normal way of transmitting signals.

An intermediate step is to use Multipoint-equipped TVs with a decompression box. The TV will need one more output but this can be placed beside the Multipoint connector, and can be connected by the consumer. Once he has such a decompression box, he'll be able to enjoy the benefits of compression without making the investment in a TV set having internal decompression circuitry.

APPLICATION OF MULTIPOINT TO HDTV

The same arguments apply, perhaps more strongly, to high definition TV (HDTV). When the HDTV standard is ready for deployment, there will be a most serious "chicken and the egg" problem: with no TV sets in the hands of the public capable of receiving HDTV, broadcasters will have a serious economic problem justifying the considerable cost of HDTV equipment, delaying the time that HDTV is available. However, since the signals aren't available, the public will have no incentive to invest the considerable sum of money that a new HDTV set will inevitably cost at first. This will further delay the time that HDTV set cost can come down as a result of volume production.

A multipoint-equipped TV can accommodate a decompression box, and so will be able to be upgraded to HDTV. This could give the public almost instantaneous access to HDTV without having to make the investment in a new and expensive TV set. An add-on decoder is needed, but the cost of such will be much less than the cost of an HDTV set. Granted, the consumer will not have access to the wide screen picture, but he will have the rest of the benefits of HDTV, and a ready market for HDTV programs will exist.

APPENDIX. CATALOG OF PIN FUNCTIONS FOR EIA-563 CONNECTOR

The designations used for the pins are oriented to the needs of the TV set.

PIN 1. Audio Select. Allows an external box to decide whether or not the TV or VCR should use audio derived from its own detector, or to accept audio from the external source. The TV will need to accept audio from the external source to accommodate scrambled audio or user-friendly simulcast.

Loss of this pin would render several of the above illustrated applications of the connector, to be impossible.

PIN 2. Audio In, Left. Accepts external audio for the left channel. The impact of loss of this pin should be obvious.

PIN 3. AGC Time Constant/Video Select. Works with pin 18 to provide several functions: one of the functions is to select either the TV's internal video, or video from an external source. This is needed in order to allow seamless transition from normal unscrambled video, to a scrambled program.

The other functions are covered in more detail under the description of pin 18. They involve setting the TV up for proper acquisition of a scrambled signal.

This pin was included because it was deemed necessary to adjust the AGC time constant for certain scrambling systems, which didn't maintain the normal relationship between sync in the vertical and horizontal blanking intervals. Loss of this pin would render the standard unusable with these scrambling systems. These scrambling systems remain in use today.

PIN 4. Audio Ground. Needed for technical reasons. Audio signals are extremely

PIN 6. Audio Input, Right. Accepts external audio for the right channel. The need for this pin is obvious.

PIN 7. B-Y Channel. Input for component video, one component of chroma. the other component, if used, is on pin 18. It is needed for improved signals which don't have NTSC artifacts.

Loss of this pin would preclude interlacing using color difference signals, a loss where

equipment.

PIN 13. Fast Blanking/Chrome Ground. This is a ground pin used to provide for better video signal to noise ratio by allowing the chroma (color) signal to be grounded separately.

As with other ground pins on the connector, this one is needed in order to ensure that high quality signals can be delivered, considering all of the circuits operating in close proximity around the TV.

PIN 14. Channel Change/Power. This pin tells the external box that the TV is in the process of changing channels, or that the TV is off. The box may need to know of a channel change in order to initiate a signal acquisition process, which is only needed one time each time a signal is tuned. The external box may need to know when the TV is on, for example, if it is tracking TV viewing for a rating firm, or if it is to record billing